

**Antonio DeBlasio**

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**From:** Scotti, III, Michael J. [mscotti@freebornpeters.com]  
**Sent:** Thursday, May 22, 2008 6:23 PM  
**To:** Daniel T. Hernandez; annam@villalbagroup.com  
**Cc:** Antonio DeBlasio  
**Subject:** Freeborn & Peters Outstanding Invoices

Gentlemen,

As I discussed with Danny last night, the management committee of my firm has forbid me from providing additional documents from our files - until we have a payment plan in place - based upon the firms common law retaining lien. Please contact me to work out the details of the plan so I can provide the documents you have requested. As discussed with Ramon, a 90 day payment plan is agreeable.

If need be, I will respond in a more formal manner to the subpoena as required. However, I am hopeful we can take care of this in a more informal manner.

Please feel free to contact me at your convenience to discuss.

Sincerely,

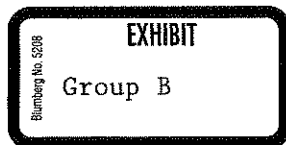
Mike

Michael J. Scotti, III

Freeborn & Peters

312-360-6374 mscotti@freebornpeters.com

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5/23/2008

**Antonio DeBlasio**

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**From:** Antonio DeBlasio  
**Sent:** Thursday, May 22, 2008 10:46 PM  
**To:** Scotti, III, Michael J.; Daniel T. Hernandez; annam@villalbagroup.com  
**Subject:** Subpoena

Dear Michael,

As you can tell from the subpoena, we are not seeking the entire legal file. The subpoena is narrowly tailored to the issues facing your former clients at the upcoming hearing on May 29, 2008. The lien you assert would remain in place even if your firm complied with the subpoena by the production of the limited category of documents.

If your firm's decision not to comply with the subpoena's request for documents by the due is based solely on the fact that there are outstanding fees owed to the firm, then your firm is subjecting its former clients to significant prejudice as they attempt to prepare for the upcoming hearing.

Please confirm that you will produce the documents by the due date in the subpoena.

Sincerely,

Tony DeBlasio

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**Cc:** Antonio DeBlasio  
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